

May 23, 2008

The Honorable Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Broadcast Localism, MB Docket No. 04-233
Main Studio Rule***

Dear Mr. Chairman:

What's good for the goose ...

When the Communications Act was written in 1934, it contained the following Section 4(e): "The principle office of the Commission shall be in the District of Columbia, where its general sessions shall be held." In essence, Congress made Washington, DC the FCC's "Community of License."

Fast forward 45 years. The Commission had outgrown its then-current location on M Street. Chairman Ferris asked Congress to amend the Act permitting the FCC to relocate outside the city boundaries. The Congress obliged the Chairman's request and included a rider to the FCC's Appropriation legislation in 1980 authorizing the Commission to relocate in an area within a 2-mile radius of the District's geographical boundaries.

In exercising his new found freedom, the Chairman's goal was to consolidate disparate FCC offices in a less expensive environment. He offered the following "business justification" for a proposed FCC move in a letter to Senator Hollings, the Chairman of the Senate Commerce Committee:

The targeted headquarters site for the Commission "is located very near the Metro and would provide excellent working conditions for the Commission's employees, including parking facilities at significantly reduced rates. But, perhaps most important, we project that relocating in Rosslyn will provide savings in rental of about \$15 - \$18 million to the taxpayers over the next eleven years."¹

¹ Congressional Record November 12, 1980 at 29325

The newly designated location – only a few hundred yards outside the DC border – apparently was convenient enough for all those who would need to transact business with the Commission, file applications and pleadings, conduct research, meet with Commission personnel and attend public meetings. It would clearly serve the FCC's "licensed community." The location was only two Metro stops from the FCC's then-existing main building and provided easy access to its employees, legislators and, importantly, members of the public including licensees, lawyers, engineers, economists and citizens. Interestingly, the new headquarters building would have been in the heart of the District of Columbia but for the return of a portion of the District to Virginia as part of the DC Retrocession in 1847.

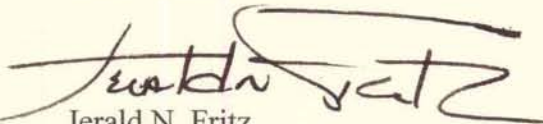
As for ease of access to the Commission, what Chairman Ferris did not know 28 years ago was how easy it would become to tap into FCC proceedings, file applications and comments, conduct research and even view Commission meetings via the internet. The FCC itself would maintain its own version of a "Public Inspection File" on its own website.

The building location targeted for the FCC's move by Chairman Ferris and for which a lease agreement was signed in 1980 was 1100 Wilson Boulevard in Rosslyn, Virginia.

How ironic. That is the main studio of WJLA-TV today – licensed to the District of Columbia.

... Is good for the gander.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Jerald N. Fritz", with a long horizontal line extending to the left.

Jerald N. Fritz
Senior Vice President
Legal and Strategic Affairs

cc: Honorable Michael J. Copps
Honorable Jonathan S. Adelstein
Honorable Deborah Taylor Tate
Honorable Robert M. McDowell